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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SUSAN B. HODGE,

Plaintiff,

vs.

PRINCESS CRUISE LINES, LTD.,
SHEVAUN VAN ZYL, M.D., AND
DOES 1-10,

Defendants.

CASE NO.: 2:24-CV-00620-FLA (ASx)

**STIPULATION TO CONTINUE
THE COURT ORDERED PRE-
TRIAL AND TRIAL DATES
(ECF NO. 22)**

Trial Date: August 11, 2025

FPTC Date: July 15, 2025

Complaint filed: January 23, 2024

Judge: Hon. Fernando L. Aenlle-Rocha

Magistrate: Hon. Alka Sagar

Plaintiff, SUSAN B. HODGE, and Defendant, PRINCESS CRUISE LINES, LTD., by and through their Counsel of Record, hereby submit the following second Stipulation and agree to Stipulate as follows:

1. **WHEREAS**, this action was filed on January 23, 2024;
2. **WHEREAS**, trial is currently set for August 11, 2025;
3. **WHEREAS**, the final pre-trial conference is currently set for July 15, 2025;
4. **WHEREAS**, on December 5, 2024 the Court issued a modified Scheduling Order outlining case related dates (ECF No. 22);
5. **WHEREAS**, the Plaintiff and Princess Cruise Lines are continuing to conduct

discovery to date;

6. **WHEREAS**, the Parties have propounded and completed written discovery;

7. **WHEREAS**, Plaintiff and Princess Cruise Lines have previously submitted one Stipulation to Continue Trial;

8. **WHEREAS**, the Parties have met and conferred and agree that GOOD CAUSE exists to seek a short additional continuance of the pre-trial and trial deadlines. The parties have worked diligently to complete written discovery and recently completed the depositions of both Plaintiff and her husband on March 4, 2025. Subsequently and in an attempt to resolve this matter prior to expenditure of additional costs and attorney fees, particularly the expert witness costs related to the upcoming April 4, 2025 expert exchange including written expert reports pursuant to Fed.R.Civ.P., Rule 26(a)(2), the parties have agreed to private mediation and are in the process of scheduling the mediation. It is anticipated that the Mediation can be completed within the next 30-45 days.

9. **WHEREAS**, this is the second request for extension of the pre-trial and trial dates;

10. **WHEREAS**, based on the foregoing, the Parties respectfully request that this Court continue the pre-trial and trial deadlines for 60 days, as set forth below:

Matter	Court Order	Requested
Trial (Jury)	8/11/25 at 8:15 a.m. Est. 4 days	10/10/25 at 8:15 a.m. Est. 4 days
Final Pre-Trial Conference [Fridays at 1:30 p.m.]	7/15/25 at 1:30 p.m.	9/12/25 at 1:30 p.m.
Last Day to Hear Motions to Add Parties and Amend Pleadings	8/9/24	---

Fact Discovery Cut-Off [Friday]	3/28/25	5/27/25
Expert Disclosure (Initial)	4/4/25	6/3/25
Expert Disclosure (Rebuttal)	4/18/25	6/17/25
Expert Discovery Cut-Off	5/2/25	7/1/25
Last Day to <u>Hear</u> Motions [Friday] <ul style="list-style-type: none"> • Rule 56 Motion due at least 5 weeks before hearing • Opposition due 2 weeks after Motion is filed • Reply due 1 week after Opposition is filed 	5/30/25	7/29/25
Deadline to Complete Settlement Conference [L.R. 16-15]	6/20/25 Private Mediation	8/19/25 Private Mediation
Trial Filings (first round) <ul style="list-style-type: none"> • Motions in Limine • Memoranda of Contentions of Fact and Law [L.R. 16-4] • Witness Lists [L.R. 16-5] • Joint Exhibit List [L.R. 16-6.1] • Joint Status Report Regarding Settlement 	6/27/25	8/26/25
Trial Filings (second round) <ul style="list-style-type: none"> • Oppositions to Motions in Limine • Joint Proposed Final Pretrial Conference Order [L.R. 16-7] • Joint Agreed Upon Proposed Jury Instructions • Disputed Proposed Jury Instructions • Joint Proposed Verdict Forms • Joint Proposed Statement of the Case • Proposed Voir Dire Questions, if any 	7/11/25	9/9/25

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

THE PARTIES AGREE that GOOD CAUSE exists and the Parties request that the Court continue the Pre-Trial and Trial deadlines as set forth above or to dates convenient to this Honorable Court.

1 **IT IS SO STIPULATED.**

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4 DATED: March 13, 2025 LAW OFFICES OF AKSANA M. COONE

5
6 By: s/ Aksana M. Coone
7 Aksana M. Coone
8 Attorneys for Plaintiff, Susan B. Hodge

9 DATED: March 13, 2025 MALTZMAN & PARTNERS

10 By: s/ Edgar R. Nield
11 Jeffrey B. Maltzman
12 Edgar R. Nield
13 Gabrielle De Santis Nield
14 Attorneys for Defendant,
15 Princess Cruise Lines Ltd.

16 **FILER'S ATTESTATION**

17 The filing attorney attests that the filing attorney has obtained permission
18 regarding the filing of this document from the signatories of this document. Further,
19 the filing attorney hereby certifies that the content of this stipulation is acceptable to
20 all parties required to sign this stipulation. All parties authorize the filing attorney to
21 affix their CM/ECF electronic signatures to this stipulation.

22
23 DATED: March 13, 2025 MALTZMAN & PARTNERS

24 By: s/ Edgar R. Nield
25 Jeffrey B. Maltzman
26 Edgar R. Nield
27 Gabrielle De Santis Nield
28 Attorneys for Defendant,
Princess Cruise Lines Ltd.